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Via Email

Robert D. MacGill

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Re: Hunt v. Southern Baptist Convention, et al.  
No. 3:23-cv-243 (M.D. Tenn.)

Rob and Scott:

I write in response to Rob's letter of July 21, 2023 regarding our client's discovery responses as well as Scott's email of the same date, asking when we expected to produce Guidepost's documents.

As you know, the parties submitted the Proposed Protective Order on Monday of this week, after agreement was reached by all parties on its content. The Court has not yet signed and entered that Order. Nevertheless, in anticipation of the Court's doing so, Guidepost is collecting documents for upload to an ESI vendor for their review and production in due course.

Regarding the specific items raised in your July 21 letter, our client's responses reflect that Guidepost is collecting responsive documents for production notwithstanding certain of the objections you have highlighted. We trust that Guidepost's document production will obviate the need to "withdraw" or otherwise resolve those objections.

Very truly yours,

*s/ John R. Jacobson*

John R. Jacobson

cc: Kathy Klein  
Steve Mintz  
Terry McCormick  
Patrick Sanders